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23 (Additional Counsel on Subsequent Page)

24 UNITED STATES DISTRICT COURT
25 CENTRAL DISTRICT OF CALIFORNIA
26 HONORABLE GEORGE H. WU

27 UNITED STATES OF AMERICA,
28 Plaintiff,
vs.
MICHAEL LERMA, et al,
Defendants.

Case No.: CR 18-00172-GW
AMENDED STIPULATION
REGARDING THE FILING OF RULE
29 AND 33 MOTIONS AND THE
HEARING ON POST-TRIAL MOTIONS

Additional Counsel

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Attorneys for Defendant MICHAEL LERMA

1 Defendants Michael Lerma, by and through his counsel of record, Marri B.
2 Derby and Joel Furman, Carlos Gonzalez, by and through his counsel of record,
3 Kenneth M. Miller and Richard Novak, Juan Sanchez, by and through his counsel
4 of record, Charles P. Diamond, Richard P. Lasting and Amy R. Lucas, and Jose
5 Valencia Gonzalez, by and through his counsel of record, Shaun Khojayan and
6 Daniel A. Nardoni, and Assistant United States Attorney Kyle Kahan stipulate to
7 the following deadlines for the filing of post-trial motions:

- 8 1. The defense post-trial motions under Rule 29 and 33 motions will be filed by
9 Monday, September 22, 2025;
- 10 2. The government oppositions to these motions will be filed by Monday,
11 October 20, 2025;
- 12 3. The defense replies to the government's oppositions will be filed by Monday,
13 November 10, 2025;
- 14 4. The hearing on the defense post-trial motions under Rule 29 and 33 motions
15 will take place on Monday, December 8, 2025;
- 16 5. The sentencing hearings for the defendants, as necessary, would be held on
17 January 5, 2026.

18
19 Respectfully submitted,

20 IT IS SO STIPULATED

21 Dated: July 15, 2025

22 s/ Marri B. Deby (with authorization)
23 Marri B. Derby
24 Joel Furman
25 Attorneys for Defendant
26 Michael Lerma
27
28

1 IT IS SO STIPULATED

2 Dated: July 15, 2015

s/ Richard G. Novak (with authorization)

3 Kenneth M. Miller

4 Richard G. Novak

Attorneys for Defendant

5 Carlos Gonzalez

6 IT IS SO STIPULATED

7 Dated: July 15, 2025

s/ Charles P. Diamond (with authorization)

8 Charles P. Diamond

9 Richard P. Lasting

10 Amy R. Lucas

11 Attorneys for Defendant

12 Juan Sanchez

13 IT IS SO STIPULATED

14 Dated: July 15, 2025

s/ Shaun Khojayan

15 Shaun Khojayan

16 Daniel A. Nardoni

17 Attorneys for Defendant

18 Jose Valencia Gonzalez

19 IT IS SO STIPULATED

20 Dated: July 15, 2025

s/ AUSA Kyle W. Kahan (with authorization)

21 Kyle W. Kahan

22 Kellye Ng

23 Jason A. Gorn

24 Assistant United States Attorneys